

1 **QUINN EMANUEL URQUHART & SULLIVAN, LLP**

2 Diane M. Doolittle (CA Bar No. 142046)  
dianedoolittle@quinnemanuel.com  
3 Sara Jenkins (CA Bar No. 230097)  
sarajenkins@quinnemanuel.com  
4 555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, CA 94065  
5 Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

Andrew H. Schapiro (admitted *pro hac vice*)  
andrewschapiro@quinnemanuel.com  
Teuta Fani (admitted *pro hac vice*)  
teutafani@quinnemanuel.com  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
Telephone: (312) 705-7400  
Facsimile: (312) 705-7401

7 Stephen A. Broome (CA Bar No. 314605)  
stephenbroome@quinnemanuel.com  
8 Viola Trebicka (CA Bar No. 269526)  
violatrebicka@quinnemanuel.com  
9 Crystal Nix-Hines (Bar No. 326971)  
crystalnixhines@quinnemanuel.com  
10 Alyssa G. Olson (CA Bar No. 305705)  
alyolson@quinnemanuel.com  
11 865 S. Figueroa Street, 10th Floor  
12 Los Angeles, CA 90017  
13 Telephone: (213) 443-3000  
Facsimile: (213) 443-3100

Josef Ansorge (admitted *pro hac vice*)  
josefansorge@quinnemanuel.com  
Xi (“Tracy”) Gao (CA Bar No. 326266)  
tracygao@quinnemanuel.com  
Carl Spilly (admitted *pro hac vice*)  
carlspilly@quinnemanuel.com  
1300 I Street NW, Suite 900  
Washington D.C., 20005  
Telephone: (202) 538-8000  
Facsimile: (202) 538-8100

14 Jomaire Crawford (admitted *pro hac vice*)  
15 jomairecrawford@quinnemanuel.com  
16 51 Madison Avenue, 22nd Floor  
17 New York, NY 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100

18 Jonathan Tse (CA Bar No. 305468)  
19 jonathantse@quinnemanuel.com  
20 50 California Street, 22nd Floor  
21 San Francisco, CA 94111  
Telephone: (415) 875-6600  
Facsimile: (415) 875-6700

22 *Counsel for Defendant Google LLC*

23 UNITED STATES DISTRICT COURT

24 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

25 CHASOM BROWN, WILLIAM BYATT,  
26 JEREMY DAVIS, CHRISTOPHER  
27 CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of themselves and  
all others similarly situated,

28 Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF JOSEF ANSORGE IN SUPPORT OF GOOGLE LLC'S ADMINISTRATIVE MOTION UPDATING THE COURT ON ITS PRESERVATION IMPLEMENTATION EFFORTS AND SEEKING RELIEF FROM THE JULY 30 DEADLINE IMPOSED BY THE JULY 15, 2022 PRESERVATION ORDER (DKT. 630)**

Judge: Hon. Susan van Keulen, USMJ

Case No. 4:20-cv-03664-YGR-SVK

1 I, Josef Ansorge, declare as follows:

2 1. I am a member of the bar of the District of California and Of Counsel with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google in this action. I submit this  
4 declaration in support of Google LLC's Administrative Motion Seeking Relief from the July 30  
5 Deadline Imposed by the July 15, 2022 Preservation Order (Dkt. 630) ("Motion Seeking Relief"). I  
6 make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness,  
7 I could and would testify competently thereto.

8 2. On July 26, 2022, Google wrote twice to Plaintiffs regarding the Motion Seeking  
9 Relief and requested a meet and confer.

10 3. On July 27, 2022, I met and conferred with Plaintiffs' Counsel Mark C. Mao and  
11 Ryan McGee to discuss Google seeking relief from the July 30, 2022 deadline to complete the  
12 decryption and re-encryption pipeline for sensitive rotating keys. The parties were not able to reach  
13 any stipulation regarding Google's Motion Seeking Relief. At the time of filing, Plaintiffs did not  
14 oppose or support Google's Motion Seeking Relief and reserved all rights.

15 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
16 and correct. Executed in Washington D.C. on July 27, 2022.

17 19  
20 By

*/s/ Josef Ansorge*  
21 Josef Ansorge

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